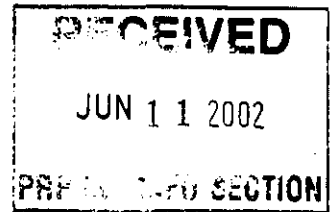


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NUCERO ELECTRICAL CONSTRUCTION CO., INC.

7210 WISSINOMING STREET
PHILADELPHIA, PA 19135
(215) 338-9500
FAX (215) 338-9504

June 11, 2002



VIA HAND DELIVERY

Ms. Carlyn Winter Prisk (3HS11)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

**Re: Nucero Electrical Construction Co., Inc.
Required Submission of Information
Lower Darby Creek Area Superfund Site - Clearview Landfill, Folcroft Landfill,
and Folcroft Landfill Annex**

Dear Ms. Prisk:

Nucero Electrical Construction Co., Inc. ("Nucero") received a request for information directed to Nucero Corporation from the Environmental Protection Agency on May 13, 2002. Our counsel contacted Brian Nishitani, Esquire of the EPA's office of General Counsel and obtained an extension to respond through June 11, 2002. We have made an investigation into the areas of inquiry, including a search for responsive documents and interviews of person who might have had relevant information. Nucero's responses are as follows:

1. Nucero Electrical Construction Co., Inc.
2. 7210 Wissinoming Street
3. Philadelphia, PA 19135
4. (215) 338-9500

- a. May 16, 1966, Pennsylvania.
- a. May 16, 1966, Pennsylvania.
- a. None.

2. Nucero performs electrical contracting work primarily for public entities in the Philadelphia, Pennsylvania area. The nature of Nucero's work was the same between 1958 and 1976. This work included the installation and renovation of electrical systems in buildings as well as outdoor lighting.

3. The president and sole stockholder between 1958 and 1976, Leonard A. Nucero, Sr., deceased, would have had personal knowledge of Nucero's operations and waste disposal practices. Thomas J. Reilly, Jr. had personal knowledge of Nucero's operations and may have had knowledge of waste disposal practices during the relevant time period. Mr. Reilly's address is [REDACTED] and his telephone number is [REDACTED].

4. To the best of my recollection, the only type of waste during the time period in question handled, generated, stored, treated, transported, recycled, formulated or disposed of by Nucero was paper, cardboard and scrap steel. No documentation was kept on these materials. Any invoices or other documentation regarding this waste is not available as Nucero has a document retention policy of retaining documents for 10 years and then

discarding them.

6.

a.

This information is not available as Nucero has a document retention policy of retaining documents for 10 years and then discarding them.

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3. The only possible hazardous substances purchased between 1958 and 1976 would have been transformer oil contained in transformers purchased for installation by Nucero and mercury in mercury vapor lamps which were purchased for installation by Nucero. These transformers and mercury vapor lamps were not disposed of by Nucero; rather, they were installed by Nucero at various facilities as part of Nucero's electrical contracting operations. Any chemical analyses and Material Data Safety Sheets are not available as Nucero has a document retention policy of retaining documents for 10 years and then discarding them.

4.

a. The hazardous substances identified above were contained in components installed at various electrical construction projects. Nucero did not dispose of these substances.

a. The chemical composition and characteristics of the substances is unknown as they were contained in the respective components. It is believed that the transformer oil was in liquid form and that the mercury in the mercury vapor lamps was in the form of gas.

a. The annual quantities purchased were dependent upon the requirements of the construction projects worked on for that particular year. No documentation is available as Nucero has a document retention policy of retaining documents for 10 years and then discarding them.

a. Transformers and mercury vapor lamps were purchased for installation by Nucero from 1958 to 1976.

a. Mercury vapor lamps were received, transported and stored in cardboard boxes. Transformers were received, transported and stored on wooden skids. These transformers and mercury vapor lamps were not disposed of by Nucero; rather, they were installed by Nucero at various facilities as part of Nucero's electrical contracting operations.

a. It is believed that Westinghouse supplied mercury vapor lamps and both Westinghouse and Federal Pacific supplied transformers.

6. The products used in Nucero's work were conduit (steel and PVC), wire, cable, panels and switchboards, lighting fixtures and transformers. The only by-products and wastes generated were the packaging and storage devices for these products. These wastes included cardboard boxes, wooden reels and wooden skids.

7. For a period of time from 1974 through 1975, Nucero fabricated fiberglass ventilation ducts for Edgeley Air Products, a company owned by Mr. Nucero.

8.

a. The above products were purchased from electrical supply houses and vendors. The waste cardboard and wood were burned at the construction sites. The scrap fiberglass board was disposed of in dumpsters furnished by Tri-County Hauling.

a. The chemical composition of the products is unknown. They were in a solid state.

a. The annual quantities generated were dependent upon the requirements of the construction projects worked on for that particular year. No documentation is available

as Nucero has a document retention policy of retaining documents for 10 years and then discarding them.

a. The waste cardboard and wood were burned at the construction sites.

a. The waste cardboard and wood were burned at the construction sites.

a. The waste cardboard and wood were burned at the construction sites.

6. Yes, Tri-County Hauling.

7.

a.. This information is not available as Nucero has a document retention policy of retaining documents for 10 years and then discarding them.

b. July 1974 through July 1975.

c.

d. Fiberglass board. The chemical composition is unknown. The board was in the solid state.

e.

d. This information is not available as Nucero has a document retention policy of retaining documents for 10 years and then discarding them.

e. Dumpster.

f.

g. Unknown.

h.

i. Unknown.

j.

k. Unknown.

l.

i. This information is not available as Nucero has a document retention policy of retaining documents for 10 years and then discarding them.

8. a.-c. Mr. Nucero was the person who contacted Tri-County Hauling to rent dumpsters. It is unknown, but doubtful, whether he knew where Tri-County Hauling was taking the waste.

9.

10. Nucero has no knowledge or records which would indicate where the waste placed in trash dumpsters rented from Tri-County Hauling were taken for disposal.

11. No.

12.

13. These individuals are the same persons identified by the answer to question 3 above.

14.

15. No.

16.

17. No.

18.

19. James Schleiden

20. 7210 Wissinoming Street

21. Philadelphia, PA 19135

22. (215) 338-9500

23. Executive Vice President

24.

25. Any documents which may have been responsive to the information request are no longer available as they have been destroyed.

26.

a.. Nucero has a document retention policy of retaining documents for 10 years and then

discarding them.

b. Records were trashed after 10 years.

c.

d. Dumpster invoices, product purchase orders and packing slips.

e.

f. Mr. Nucero was responsible for producing, retaining and destroying
g. documents relating to the time period of 1958 and 1976.

h.

i. Thank you for your attention to this matter. If you have any further questions, please do not hesitate to
contact me.

j.

k.

l.

m.

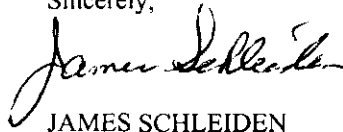
n.

o.

p.JS/law

cc: Cohen, Seglias, Pallas, Greenhall & Furman, P.C.

Sincerely,



JAMES SCHLEIDEN

NUCERO ELECTRICAL CONSTRUCTION CO., INC.

7210 WISSANOMING ST. PHILADELPHIA, PENNSYLVANIA 19135

VIA HAND DELIVERY

Ms. Carlyn Winter Prisk (3HS11)

U.S. Environmental Protection Agency, Region
III

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